

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HUAWEI TECHNOLOGIES CO. LTD., Plaintiff, v. T-MOBILE US, INC. and T-MOBILE USA, INC., Defendants, NOKIA SOLUTIONS AND NETWORKS US LLC and NOKIA SOLUTIONS AND NETWORKS OY, TELEFONAKTIEBOLAGET LM ERICSSON and ERICSSON INC., Intervenors.	Civil Action No. 2:16-cv-00057-JRG-RSP JURY TRIAL DEMANDED
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NOTICE REGARDING CLAIM CONSTRUCTIONS

Pursuant to the Court’s instruction at the March 17 *Markman* hearing, Plaintiff Huawei Technologies Co. Ltd. (“Plaintiff”) Huawei provides the following update regarding the potential compromise claim constructions for U.S. Patent No. 8,625,527 that the Court and the parties discussed at the hearing.

“terminal side of a second user” / “terminal side of the second user” (Claims 1, 29, 41)

Further to the discussions at the hearing, the parties have conferred and have agreed to the following construction: “[a/the] second user’s User Equipment (UE) when the second user is on an IP-based network, otherwise, [a/the] second user’s UE, an interworking gateway, and the connection between them if the second user is in the CS domain/PSTN.”

“user plane first connection between the HOSF and a Handover Anchor Function-User Plane (HOAF-UP) of the second user” (Claim 1) / “HOAF-UP is configured to establish the user plane first connection between the HOSF and the HOAF-UP” (Claim 29)

At the hearing, Defendants and Intervenor proposed the constructions “connection for the user plane from the HOSF to the second user’s HOAF-UP without an intermediate anchor” for claim 1, and “HOAF-UP is configured to establish a connection for the user plane from the HOSF to the HOAF-UP without an intermediate anchor.” Plaintiff has analyzed these proposed constructions and is unable to agree to the added limitation “without an intermediate anchor.” Plaintiff rests on its briefing and arguments at the hearing for these terms.

Dated: April 5, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on April 5, 2017 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Brian G. Strand

Brian G. Strand